

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

**(1) MASON MECKLENBURG,**

**Plaintiff,**

**v.**

**Case No. CIV-22-089-G**

**(1) KINGFISHER INDEPENDENT  
SCHOOL DISTRICT NO. 7 OF  
KINGFISHER COUNTY,  
OKLAHOMA, a/k/a KINGFISHER  
SCHOOL DISTRICT, a/k/a  
KINGFISHER PUBLIC SCHOOLS;**

**(2) JEFF MYERS, individually;**

**(3) MICAH NALL, individually;**

**(4) DEREK PATTERSON, individually;  
and;**

**(5) BLAKE EATON, individually,**

**Defendants.**

**JOINT MOTION FOR LEAVE TO FILE UNDER SEAL DEFENDANTS  
KINGFISHER PUBLIC SCHOOLS, PATTERSON, AND EATON'S  
PRELIMINARY WITNESS AND EXHIBIT LIST AND DEFENDANTS  
KINGFISHER SCHOOL DISTRICT, BLAKE EATON, DEREK PATTERSON,  
MICAH NALL AND JEFF MYERS' OBJECTIONS TO PLAINTIFF'S EXHIBITS**

Counsel for Defendants School District a/k/a/ Kingfisher Public Schools, Derek Patterson, and Blake Eaton, and Micah Nall and counsel for Defendant Jeff Myers respectfully request permission to file under seal an unredacted copy of *Defendants Kingfisher Public Schools, Patterson and Eaton's Preliminary Witness and Exhibit List* and *Defendants Kingfisher School District, Blake Eaton, Derek Patterson, Micah Nall,*

*and Jeff Myers' Objections to Plaintiff's Exhibits*, In support of their request, Defendants state as follows:

1. This Motion complies with ECF Policies and Procedures Manual, § III(A), and the Agreed Protective Order governing this case (Dkt. No. 36).
2. By necessity, *Defendants Kingfisher Public Schools, Patterson and Eaton's Preliminary Witness and Exhibit List* and *Defendants Kingfisher School District, Blake Eaton, Derek Patterson, Micah Nall, and Jeff Myers' Objections to Plaintiff's Exhibits* will contain privileged and potentially sensitive information. In order to keep this information confidential, counsel for Defendants listed herein seek an Order from the Court allowing them to file an unredacted copy of *Defendants Kingfisher Public Schools, Patterson and Eaton's Preliminary Witness and Exhibit List* and *Defendants Kingfisher School District, Blake Eaton, Derek Patterson, Micah Nall, and Jeff Myers' Objections to Plaintiff's Exhibits* under seal. A proposed Order is submitted contemporaneously herewith.

Counsel for Defendants listed request the Court grant this *Joint Motion for Leave to File Under Seal Defendants Kingfisher Public Schools, Patterson, and Eaton's Preliminary Witness and Exhibit List* and *Defendants Kingfisher School District, Blake Eaton, Derek Patterson, Micah Nall and Jeff Myers' Objections to Plaintiff's Exhibits*.

Respectfully submitted,

s/ Eric D. Janzen

John E. Priddy, OBA No. 13604  
Eric D. Janzen, OBA No. 13826

ROSENSTEIN, FIST & RINGOLD  
525 South Main, Suite 700  
Tulsa, OK 74103-4500  
(918) 585-9211  
(918) 583-5617 (Facsimile)

ATTORNEYS FOR DEFENDANT,  
KINGFISHER PUBLIC SCHOOLS,  
BLAKE EATON, AND DEREK PATTERSON

s/ Mark S. Rains

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Mark S. Rains, OBA No. 10935 (signed by  
filing party with permission of attorney)  
ROSENSTEIN, FIST & RINGOLD  
525 South Main, Suite 700  
Tulsa, OK 74103-4500  
(918) 585-9211  
(918) 583-5617 (Facsimile)

ATTORNEY FOR DEFENDANT, MICAH  
NALL

s/ Matthew P. Cyran

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Matthew P. Cyran, OBA No. 16918 (signed by  
filing party with permission of attorney)  
Joe E. White, Jr., OBA No. 12930  
Kate C. White, OBA No. 30930  
WHITE & WEDDLE, P.C.  
630 N.E. 63<sup>rd</sup> Street  
Oklahoma City, OK 73105  
(405) 858-8899  
(405) 858-8844 (Facsimile)

ATTORNEYS FOR DEFENDANT, JEFF  
MYERS

**CERTIFICATE OF SERVICE**

☒ I hereby certify that on June 20, 2023, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

Cameron Spradling, Esq.  
Attorney & Counselor at Law  
500 North Walker Ave., Suite 100  
Oklahoma City, Oklahoma 73102  
cameron@cameronspradling.com

Bradley E. Beckworth, Esq.  
Nathan B. Hall, Esq.  
Ross Leonoudakis, Esq.  
NIX PATTERSON, LLP  
8701 Bee Cave Road  
Building 1, Suit 500  
Austin, Texas 78746  
bbeckworth@nixlaw.com  
nhall@nixlaw.com

Mark S. Rains, Esq.  
ROSENSTEIN, FIST & RINGOLD  
525 S. Main Street, Suite 700  
Tulsa, Oklahoma 74103  
mrains@rfrlaw.com

Joe E. White, Jr., OBA No. 12930  
Kate C. White, OBA No. 30930  
Matthew P. Cyran, OBA No. 16918  
WHITE & WEDDLE, P.C.  
630 N.E. 63<sup>rd</sup> Street  
Oklahoma City, OK 73105  
(405) 858-8899  
(405) 858-8844 (Facsimile)  
joe@whiteandweddle.com  
kate@whiteandweddle.com  
matt@whiteandweddle.com

☐ I hereby certify that on \_\_\_\_\_, I filed the attached document with the Clerk of the Court and served the attached document by \_\_\_\_\_ on the following, who are not registered participants of the ECF System:

*s/Eric D. Janzen*

**ERIC D. JANZEN**